

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

AFFIDAVIT

1. I am a Special Agent (SA) of the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) and have been so employed for over 15 years. I am assigned to the HSI Raleigh, North Carolina field office (HSI-Raleigh) and my duties include, among other things, investigating violations of Titles 8, 18, 19, 21, 31, and 42 of the United States Code (U.S.C.). As part of these duties, I have led or participated in hundreds of investigations involving criminal and/or administrative violations of law. Prior to reporting for assignment at HSI-Raleigh, I attended training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, where I received instruction in federal criminal statutes, search, seizure, and arrest authority, use of force, and many other facets of federal and general law enforcement. Prior to my employment with HSI, I worked five (5) years as an accountant and obtained undergraduate and master's degrees in business administration with concentrations in finance.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is made in support of a criminal information against THAWNG LANG, HUSSEIN BIN ABDUL SHUKUR, EH BA HTOO, SAN OO, SHA

BWAY WAH, JAT KNAT, DAY LAY HTOO, MU DAH, LU DEE, PA LA PAY, MOHAMED HUSSEIN BI SYEDUL RAHMAN, HEH KU, SHA PE, PHILIPPO ZIN, KAP LAK MUAN, JAW SHI, NAW WAH, SOE SOE MOO, ZIABULHAQ BIN ENAMULHAQ, HASSAN BIN YOUSUF, TURKI MAHMOUD DAGHER, MOHAMMED NAZRUL ISLAM, MOHAMED HAFIZ BIN MOHAMED RAHIM, MOHAMAD OTHAM BIN HALA MIAH, THANG DI MAUNG (hereinafter referred to collectively as “the defendants”), Individual D.S., and others known and unknown, who did knowingly combine, conspire, confederate, and agree to commit offenses against the United States, that is, to knowingly possess identification documents knowing that such documents were produced without lawful authority, in violation of Title 18, U.S.C., § 371 and 1028(a)(6).

4. Because this affidavit is being submitted for the purpose of securing summonses for the appearance of the defendants, I have not included every fact known to me concerning this investigation. Instead, I have set forth only those facts necessary to establish probable cause to believe that the aforementioned violations occurred and that the defendants committed them. The facts contained in this affidavit come from my personal involvement in this investigation, information obtained from others involved in this investigation, and a review of the records and documents obtained during this investigation.

BACKGROUND INFORMATION

5. The North Carolina Division of Motor Vehicles (hereinafter referred to as the “DMV”) is the division of the North Carolina Department of Transportation

which oversees the issuance of driver's licenses, learner's permits, identification cards, and vehicle registrations within the state of North Carolina.

6. North Carolina General Statute § 20-7(b1) states, in pertinent part, that “[t]o obtain an identification card, learners permit, or drivers license from the [DMV], a person shall complete an application form provided by the [DMV], present at least two forms of identification approved by the Commissioner, be a resident of this State, and, except for an identification card, demonstrate his or her physical and mental ability to driver safely a motor vehicle included in the class of license for which the person has applied.”

7. North Carolina General Statute § 20-7(b3) states, in pertinent part, that “[t]he [DMV] shall adopt rules implementing the provisions of subsection (b1) of this section with respect to proof of residency in this State.” Among the list of acceptable documents for proof of residency in North Carolina is a preprinted bank or other corporate statement.

8. North Carolina General Statute § 20-7(b5) states, in pertinent part, that “[t]he [DMV] rules adopted pursuant to subsection (b3) of this section shall also provide that if an applicant cannot produce any documentation specified in subsection (b3) ...the applicant... may complete an affidavit, on a form provided by the [DMV] and sworn to before an official of the [DMV], indicating the applicant's current residence address[.]”

9. The DMV requires all applicants to certify and affirm under penalty of perjury that information presented is true and correct, that any documents they

present to the DMV are genuine, that the information included in all supporting documentation is true and accurate, and that the applicant understands that knowingly making a false statement or representation on the application is a criminal violation.

10. Most neighboring or surrounding states to North Carolina do not allow for the use of an interpreter during the application or the testing phase of obtaining a learner's permit or driver's license. North Carolina, however, does allow for the use of an interpreter. Therefore, by claiming to be a resident of North Carolina, an applicant would be allowed to use an interpreter to obtain North Carolina DMV documents.

11. Most states have reciprocal agreements with North Carolina, wherein an applicant would be allowed to transfer their North Carolina DMV to the state in which they reside, without additional testing.

12. Individual D.S. is a naturalized United States citizen from Burma, who speaks Burmese and Karen. Individual D.S. owned and operated an interpreter business that catered to individuals within the Burmese community. Individual D.S. maintained residential addresses in Lumberton, North Carolina and Raleigh, North Carolina that were used by approximately one-hundred and ninety-eight (198) individuals to fraudulently open or alter bank accounts to meet North Carolina's residency requirements. The use of the residential addresses resulted in the unlawful issuance of North Carolina learner's permits, driver's licenses, and/or identification cards.

PROBABLE CAUSE

13. On or about August 25, 2016, THAWNG LANG, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, THAWNG LANG provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that THAWNG LANG had previously opened using the address of Individual D.S. Individual D.S. interpreted for THAWNG LANG and completed a certification for foreign language interpreter. As a result, THAWNG LANG received a North Carolina learner's permit.

14. On or about August 30, 2016, HUSSEIN BIN ABDUL SHUKUR, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, HUSSEIN BIN ABDUL SHUKUR provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. interpreted, or caused another individual to interpret, for HUSSEIN BIN ABDUL SHUKUR. As a result, HUSSEIN BIN ABDUL SHUKUR received a North Carolina learner's permit. Later, on or about August 31, 2016, HUSSEIN BIN ABDUL SHUKUR met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the

time of the application, HUSSEIN BIN ABDUL SHUKUR provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for HUSSEIN BIN ABDUL SHUKUR. As a result, HUSSEIN BIN ABDUL SHUKUR received a North Carolina driver's license.

15. On or about August 31, 2016, EH BA HTOO, a resident of South Carolina, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, EH BA HTOO provided DMV the address of Individual D.S. in Lumberton, North Carolina and documentation for a bank account that EH BA HTOO had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for EH BA HTOO. As a result, EH BA HTOO received a North Carolina learner's permit.

16. On or about September 20, 2016, SAN OO, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, SAN OO provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that SAN OO had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for SAN OO. As a result, SAN

OO received a North Carolina learner's permit. Later, on or about September 21, 2016, SAN OO met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, SAN OO provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for SAN OO. As a result, SAN OO received a North Carolina driver's license.

17. On or about October 6, 2016, SHA BWAY WAH, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, SHA BWAY WAH provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that SHA BWAY WAH had previously opened using the address of Individual D.S. Individual D.S. interpreted for SHA BWAY WAH and completed a certification for foreign language interpreter. As a result, SHA BWAY WAH received a North Carolina learner's permit.

18. On or about October 11, 2016, JAT KNAT, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, JAT KNAT provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that JAT KNAT had previously opened using the address of Individual D.S. Individual D.S.

interpreted for JAT KNAT and completed a certification for foreign language interpreter. As a result, JAT KNAT received a North Carolina learner's permit.

19. On or about October 12, 2016, DAY LAY HTOO, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, DAY LAY HTOO provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that DAY LAY HTOO had previously opened using the address of Individual D.S. Individual D.S. interpreted for DAY LAY HTOO and completed a certification for foreign language interpreter. As a result, DAY LAY HTOO received a North Carolina learner's permit.

20. On or about October 31, 2016, MU DAH, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, MU DAH provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. interpreted for MU DAH and completed a certification for foreign language interpreter. As a result, MU DAH received a North Carolina learner's permit.

21. On or about October 31, 2016, LU DEE, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, LU DEE provided DMV the address of Individual D.S. in

Raleigh, North Carolina, and documentation for a bank account that LU DEE had previously opened using the address of Individual D.S. Individual D.S. interpreted for LU DEE and completed a certification for foreign language interpreter. As a result, LU DEE received a North Carolina learner's permit.

22. On or about November 1, 2016, PA LA PAY, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, PA LA PAY provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. interpreted for PA LA PAY and completed a certification for foreign language interpreter. As a result, PA LA PAY received a North Carolina learner's permit. Later, on or about November 2, 2016, PA LA PAY met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, PA LA PAY provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for PA LA PAY. As a result, PA LA PAY received a North Carolina driver's license.

23. On or about November 7, 2016, MOHAMED HUSSEIN BI SYEDUL RAHMAN, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, MOHAMED

HUSSEIN BI SYEDUL RAHMAN provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that MOHAMED HUSSEIN BI SYEDUL RAHMAN had previously opened using the address of Individual D.S. Individual D.S. interpreted for MOHAMED HUSSEIN BI SYEDUL RAHMAN and completed a certification for foreign language interpreter. As a result, MOHAMED HUSSEIN BI SYEDUL RAHMAN received a North Carolina learner's permit.

24. On or about November 15, 2016, HEH KU, a resident of South Carolina, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, HEH KU provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that HEH KU had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for HEH KU. As a result, HEH KU received a North Carolina learner's permit.

25. On or about November 15, 2016, SHA PE, a resident of South Carolina, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, SHA PE provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. interpreted, or caused another

individual to interpret, for SHA PE. As a result, SHA PE received a North Carolina learner's permit.

26. On or about November 17, 2016, PHILIPPO ZIN, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, PHILIPPO ZIN provided DMV the address of Individual D.S. in Lumberton, North Carolina, and documentation for a bank account that PHILIPPO ZIN had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for PHILIPPO ZIN. As a result, PHILIPPO ZIN received a North Carolina learner's permit. Later, on or about November 18, PHILIPPO ZIN met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, PHILIPPO ZIN provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for PHILIPPO ZIN. As a result, on or about December 28, 2016, PHILIPPO ZIN received a North Carolina driver's license.

27. On or about November 18, 2016, KAP LAK MUAN, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and

to comply with DMV's residency requirements, KAP LAK MUAN provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that KAP LAK MUAN had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for KAP LAK MUAN. As a result, KAP LAK MUAN received a North Carolina learner's permit.

28. On or about December 1, 2016, JAW SHI, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, JAW SHI provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that JAW SHI had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for JAW SHI. As a result, JAW SHI received a North Carolina learner's permit.

29. On or about December 6, 2016, NAW WAH, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, NAW WAH provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that NAW WAH had previously opened using the address of Individual D.S. Individual D.S.

interpreted for NAW WAH and completed a certification for foreign language interpreter. As a result, NAW WAH received a North Carolina learner's permit.

30. On or about December 20, 2016, SOE SOE MOO, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, SOE SOE MOO provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that SOE SOE MOO had previously opened using the address of Individual D.S. Individual D.S. interpreted for SOE SOE MOO and completed a certification for foreign language interpreter. As a result, SOE SOE MOO received a North Carolina learner's permit. Later, on or about December 22, 2016, SOE SOE MOO met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, SOE SOE MOO provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for SOE SOE MOO. As a result, SOE SOE MOO received a North Carolina driver's license.

31. On or about December 21, 2016, ZIABULHAQ BIN ENAMULHAQ, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, ZIABULHAQ BIN ENAMULHAQ provided DMV the address of Individual D.S. in Raleigh, North

Carolina, and documentation for a bank account that ZIABULHAQ BIN ENAMULHAQ had previously opened using the address of Individual D.S. Individual D.S. interpreted for ZIABULHAQ BIN ENAMULHAQ and completed a certification for foreign language interpreter. As a result, ZIABULHAQ BIN ENAMULHAQ received a North Carolina learner's permit.

32. On or about December 21, 2016, HASSAN BIN YOUSUF, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, HASSAN BIN YOUSUF provided DMV the address of Individual D.S. in Raleigh, North. Individual D.S. interpreted for HASSAN BIN YOUSUF and completed a certification for foreign language interpreter. As a result, HASSAN BIN YOUSUF received a North Carolina learner's permit.

33. On or about December 29, 2016, TURKI MAHMOUD DAGHER, a resident of Georgia, met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, TURKI MAHMOUD DAGHER provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that TURKI MAHMOUD DAGHER had previously opened using the address of Individual D.S. Individual D.S. interpreted, or caused another individual to interpret, for TURKI MAHMOUD

DAGHER. As a result, TURKI MAHMOUD DAGHER received a North Carolina learner's permit.

34. On or about January 18, 2017, MOHAMMED NAZRUL ISLAM, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, MOHAMMED NAZRUL ISLAM provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that MOHAMMED NAZRUL ISLAM had previously opened using the address of Individual D.S. Individual D.S. interpreted for MOHAMMED NAZRUL ISLAM and completed a certification for foreign language interpreter. As a result, MOHAMMED NAZRUL ISLAM received a North Carolina learner's permit. Later, on or about January 20, 2017, MOHAMMED NAZRUL ISLAM met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, MOHAMMED NAZRUL ISLAM provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for MOHAMMED NAZRUL ISLAM. As a result, MOHAMMED NAZRUL ISLAM received a North Carolina driver's license.

35. On or about January 18, 2017, MOHAMED HAFIZ BIN MOHAMED RAHIM, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the

application, and to comply with the DMV's residency requirements, MOHAMED HAFIZ BIN MOHAMED RAHIM provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that MOHAMED HAFIZ BIN MOHAMED RAHIM had previously opened using the address of Individual D.S. Individual D.S. interpreted for MOHAMED HAFIZ BIN MOHAMED RAHIM and completed a certification for foreign language interpreter. As a result, MOHAMED HAFIZ BIN MOHAMED RAHIM received a North Carolina learner's permit. Later, on or about January 20, 2017, MOHAMED HAFIZ BIN MOHAMED RAHIM met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, MOHAMED HAFIZ BIN MOHAMED RAHIM provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for MOHAMED HAFIZ BIN MOHAMED RAHIM. As a result, MOHAMED HAFIZ BIN MOHAMED RAHIM received a North Carolina driver's license.

36. On or about January 24, 2017, MOHAMAD OTHAM BIN HALA MIAH, a resident of South Carolina, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with DMV's residency requirements, MOHAMAD OTHAM BIN HALA MIAH provided DMV the address of Individual D.S. in Raleigh, North Carolina, and documentation for a bank account that MOHAMAD OTHAM BIN

HALA MIAH had previously opened using the address of Individual D.S. Individual D.S. interpreted for MOHAMAD OTHAM BIN HALA MIAH and completed a certification for foreign language interpreter. As a result, MOHAMAD OTHAM BIN HALA MIAH received a North Carolina learner's permit.

37. On or about January 31, 2017, THANG DI MAUNG, a resident of Georgia, met with Individual D.S. at the DMV in Henderson, North Carolina, and applied for a North Carolina learner's permit. At the time of the application, and to comply with the DMV's residency requirements, THANG DI MAUNG provided DMV the address of Individual D.S. in Raleigh, North Carolina, and bank account documentation for an account that THANG DI MAUNG had previously opened using the address of Individual D.S. Individual D.S. interpreted for THANG DI MAUNG and completed a certification for foreign language interpreter. As a result, THANG DI MAUNG received a North Carolina learner's permit. Later, on or about February 13, 2017, THANG DI MAUNG met with Individual D.S., or another individual operating under the direction and control of Individual D.S., at the DMV in Henderson, North Carolina, and applied for a North Carolina driver's license. At the time of the application, THANG DI MAUNG provided DMV the address of Individual D.S. in Raleigh, North Carolina. Individual D.S. again interpreted, or caused another individual to interpret, for THANG DI MAUNG. As a result, THANG DI MAUNG received a North Carolina driver's license.

38. In addition to the above, between January 2015, and October 28, 2019, 173 individuals who resided outside North Carolina, Individual D.S., and others

known and unknown, travelled to various DMV offices located in the Eastern District of North Carolina and applied for North Carolina learner's permits, driver's licenses, and/or identification cards. To comply with the DMV's residency requirements, the 173 individuals provided the DMV the address of Individual D.S. in Raleigh, North Carolina or Lumberton, North Carolina. Individual D.S., and other known and unknown, interpreted for the 173 individuals. As a result, these 173 individuals received North Carolina learner's permits, driver's licenses, or identification cards.

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CONCLUSION

39. Based on the foregoing, I, Christopher E. Brant, believe that there is ample probable cause to conclude that THAWNG LANG, HUSSEIN BIN ABDUL SHUKUR, EH BA HTOO, SAN OO, SHA BWAY WAH, JAT KNAT, DAY LAY HTOO, MU DAH, LU DEE, PA LA PAY, MOHAMED HUSSEIN BI SYEDUL RAHMAN, HEH KU, SHA PE, PHILIPPO ZIN, KAP LAK MUAN, JAW SHI, NAW WAH, SOE SOE MOO, ZIABULHAQ BIN ENAMULHAQ, HASSAN BIN YOUSUF, TURKI MAHMOUD DAGHER, MOHAMMED NAZRUL ISLAM, MOHAMED HAFIZ BIN MOHAMED RAHIM, MOHAMAD OTHAM BIN HALA MIAH, THANG DI MAUNG did knowingly combine, conspire, confederate, and agree to commit offenses against the United States, that is, to knowingly possess identification documents knowing that such documents were produced without lawful authority, in violation of Title 18, U.S.C., §§ 371 and 1028(a)(6), and I respectfully asks that the Court issues summonses ordering the appearance of the defendants for such violations.



Christopher E. Brant
Special Agent
Homeland Security Investigations

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means, was placed under oath, and attested to the contents of this written affidavit.
Dated: January 28, 2022



Robert T. Numbers, II
United States Magistrate Judge